



fisherphillips.com

**New Jersey**  
430 Mountain Avenue  
Suite 303  
Murray Hill, NJ 07974

(908) 516-1050 Tel  
(908) 516-1051 Fax

**Writer's Direct Dial:**  
(908) 516-1058

**Writer's E-mail:**  
aaviles@fisherphillips.com

February 28, 2022

*VIA ECF*

The Honorable Loretta A. Preska, U.S.D.J.  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Iris Hillel v. Obvio Health USA, Inc., *et al.*  
Civil Case No.: 1:20-cv-04647(LAP)(DCF)

Dear Judge Preska:

This firm represents Obvio Health USA, Inc., Obvio Health Ptd. Ltd, SPRIM Americas, Inc., Michael Shleifer, and Ivan Jarry (collectively, the “Obvio Defendants”) in connection with the above-referenced matter. We write this letter jointly with Plaintiff Iris Hillel (“Plaintiff”) (together with the Obvio Defendants, the “Parties”). As Your Honor may recall, the Parties had disagreements related to electronic discovery. Plaintiff filed a motion to compel (ECF Doc. 74), which the Obvio Defendants opposed (ECF Doc. 77). The Parties are happy to report that they have resolved the disagreements related to electronic discovery. Thus, **Plaintiff respectfully requests that the pending motion to compel (ECF Doc. 74) be withdrawn as it is moot.**

As the Parties worked to resolve the electronic disputes, the Parties do not believe that they will be able to complete discovery in the allotted time. The Parties respectfully propose and request the Court enter the following schedule for proceeding with discovery, which will not affect any other scheduled deadlines. The Parties have made one prior request to extend discovery (ECF Doc. 80). The Parties propose:

1. All fact discovery is to be completed no later than June 30, 2022. Previous deadline of March 31, 2022.
2. Depositions shall be completed by May 31, 2022. Previous deadline of February 28, 2022.
3. Requests to admit shall be served by May 31, 2022. Previous deadline of February 28, 2022.

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4. All expert discovery, including disclosure of expert reports, production of underlying documents, and depositions shall be completed by July 29, 2022. Previous deadline of April 29, 2022.

We thank the Court for Your Honor's time and consideration.

Respectfully submitted,

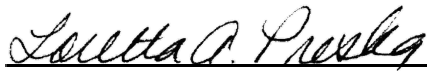
*/s/Alba V. Aviles*

Alba V. Aviles  
For FISHER & PHILLIPS LLP

cc: All counsel of record via ECF

**SO ORDERED.**

Dated: February 28, 2022  
New York, New York



LORETTA A. PRESKA

Senior United States District Judge